

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

02CR0473

UNITED STATES OF AMERICA

v.

UMAR FAROOQ and
MOHAMMED AKHTER, aka
MUHAMMAD SALEEM, aka
SALEEM MUHAMMAD, aka
MOHAMMAD SALEEM, and aka
MUHAMMAD SALIM

Case No. 2002 CR _____

Magistrate Judge Michael T. Mason

FILED

MAY - 9 2002

MICHAEL T. MASON
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT

**GOVERNMENT'S MOTION TO SEAL
COMPLAINT, AFFIDAVIT, and ARREST WARRANTS**

Now comes the UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, and states as follows in support of its Motion to Seal Complaint, Affidavit, and Arrest Warrants:

1. Special Agent Susan Woods of the Federal Bureau of Investigation is the primary source of information for the Complaint and Affidavit. The Affidavit details the facts supporting probable cause that Defendants UMAR FAROOQ and MOHAMMED AKHTER have violated federal criminal law, namely, wire fraud, in violation of Title 18, United States Code, Sections 2 and 1343.

2. The government has reason to believe, based on information from the FBI Legate in Canada and from a confidential informant, that the defendants are currently residing in Canada and are citizens of Pakistan. If the defendants were made aware of the issuance of the Arrest Warrants, they would present a flight risk. The government requests, however, that the order to seal exclude from its provisions disclosure made to and by the United States Department of Justice Office of International Affairs, as well as Canadian law enforcement authorities and Crown prosecutors, which

are necessary to effectuate the issuance of Provisional Arrest Warrants in Canada and extradition from Canada.

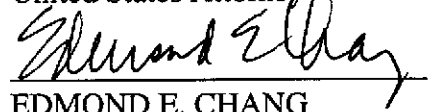
3. Furthermore, the government's investigation is currently covert and other targets of the investigation, including former Cisco employees, could jeopardize the investigation if made aware of the facts contained in the Affidavit.

4. WHEREFORE, for the foregoing reasons, the government respectfully requests that the Complaint, Affidavit, and Arrest Warrants be sealed until **June 20, 2002**.

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

By:


EDMOND E. CHANG
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 886-1000

DATE: MAY 9, 2002